

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Integrated Health Services, Inc., *et al.*

Case No. 00-389 (MFW)  
Jointly Administered

Debtors.

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IHS LIQUIDATING LLC,  
Plaintiff,

v.

ACE INDEMNITY INSURANCE COMPANY  
f/k/a INDEMNITY INSURANCE COMPANY OF  
NORTH AMERICA,

Defendant.

Civil Action No. 05-376  
(GMS)

IHS LIQUIDATING LLC,

Civil Action No. 04-1262 (GMS)

Third Party Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA, GENERAL STAR  
INDEMNITY COMPANY and ACE INDEMNITY  
INSURANCE COMPANY f/k/a INDEMNITY  
INSURANCE COMPANY OF NORTH AMERICA

Third-Party Defendants.

/

ACE INDEMNITY INSURANCE COMPANY  
f/k/a INDEMNITY INSURANCE COMPANY OF  
NORTH AMERICA,

Third-Party Defendant and  
Fourth-Party Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, and  
GENERAL STAR INDEMNITY COMPANY,

Fourth-Party Defendants.

/

**NOTICE OF DEPOSITION**

TO: Francis J. Deasey, Esq.  
Deasey, Mahoney & Bender, Ltd.  
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PLEASE TAKE NOTICE that third-party defendant/fourth-party defendant, National Union Fire Insurance Co. of Pittsburgh, PA (National Union) will take the deposition of the defendant/third-party defendant/fourth-party plaintiff ACE Indemnity Insurance Company f/k/a Indemnity Insurance Company of North America (IICNA), pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure at 10:00 a.m., on Tuesday, June 5, 2007, at the offices of IICNA Westchester Specialty Group, 500 Colonial Center Parkway, Suite 200, Roswell, GA 30076, before a notary or other competent authority authorized to administer oaths. The examination will continue from day to day until completed. The testimony shall be recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, IICNA shall designate one or more of its officers, directors, or managing agents, or such other persons who consent to testify on its behalf, to testify about the following matters:

1. IICNA's receipt, investigation, handling, adjustment and disposition of liability claims made against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.;

2. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 1999 to January 1, 2000 is not properly exhausted;

3. The investigation and formation of, and bases for, IICNA's claim that the policy of insurance issued by National Union to Integrated Health Services, covering the period from January 1, 2000 to January 1, 2002 is not properly exhausted;

4. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc. for the period from January 1, 1999 to January 1, 2000;

5. The underwriting of the policy of insurance issued by IICNA to Integrated Health Services Inc. for the period from January 1, 2000 to January 1, 2001;

6. IICNA's receipt, access to, review, auditing, maintenance, storage, and/or destruction of original files reflecting the handling of liability claims against Integrated Health Services, Inc., and against Integrated Health Services of Lester, Inc.

Dated: May 31, 2007  
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon  
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-and-

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